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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRIAN WRIGHT, and
DANIELLE PERREIRA,

Defendants.

) SUPERSEDING CRIMINAL
) INDICTMENT

) 2:14- CR - 00357-APG-VCF

) VIOLATION:

) 18 U.S.C. § 1951(a) - Hobbs Robbery
) Conspiracy (Count I); 18 U.S.C. § 924(c)(1)(A)
) - Use and Carry of Firearm in Relation to a
) Crime of Violence (Counts II and IV); 18
) U.S.C. § 1951(a) - Interference with Commerce
) by Robbery (Count III); 18 U.S.C. § 2 - Aiding
) and Abetting; (Count II and IV); 18 U.S.C. §
) 922(g)(1) and 924(a)(2) - Felon in Possession
) of a Firearm (Count V).

THE GRAND JURY CHARGES THAT:

Count One

(Conspiracy to Interfere with Commerce by Robbery)

Beginning on a date unknown, but not later than April 28, 2014, and continuing through
on or about May 20, 2014, in the State and Federal District of Nevada,

**BRIAN WRIGHT, and
DANIELLE PERREIRA,**

defendants herein, did agree and conspire together and with others known and unknown, to
unlawfully obstruct, delay and affect commerce, as that term is defined in Title 18, United States
Code, Section 1951, and the movement of articles and commodities in such commerce, by

1 robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the
2 defendants did unlawfully take and obtain property, consisting of cash monies and other
3 property, from MJ Christensen Diamonds, 8980 West Charleston Boulevard, Las Vegas,
4 Nevada; Jared's Galleria of Jewelry, 2110 North Rainbow Avenue, Las Vegas, Nevada; and MJ
5 Christensen Diamonds, 10400 South Eastern Avenue, Henderson, Nevada; all businesses that
6 affect interstate commerce, from the persons of employees of the aforementioned locations,
7 against their will, by means of actual and threatened force and violence; all in violation of Title
8 18, United States Code, Section 1951.

9 **Count Two**

(Brandishing a Firearm in Furtherance of a Crime of Violence)

10 Beginning on a date unknown, but not later than April 28, 2014, and continuing through
11 on or about May 20, 2014, in the State and Federal District of Nevada,

12 **BRIAN WRIGHT, and**
13 **DANIELLE PERREIRA,**

14 defendants herein, during and in relation to the crime of violence charged in Count One of this
15 indictment, knowingly and intentionally used and carried a firearm to wit: a silver handgun of
16 unknown make and model, and said firearm was brandished; all in violation of Title 18, United
17 States Code, Section 924(c)(1)(A)(ii) and (iii) and Title 18, United States Code, Section 2.

18 **Count Three**

(Interference with Commerce by Robbery)

19 On or about May 8, 2014, in the State and Federal District of Nevada,

20 **BRIAN WRIGHT, and**
21 **DANIELLE PERREIRA,**

22 defendants herein, did unlawfully obstruct, delay and affect commerce, as that term is defined in
23 Title 18, United States Code, Section 1951, and the movement of articles and commodities in
24 such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951,

1 in that the defendants did unlawfully take and obtain property, consisting of jewelry and other
2 property, from the persons of M.C. and B.W., employees of Jared's Galleria of Jewelry, 2110
3 North Rainbow Avenue, Las Vegas, NV, against their will, by means of actual and threatened
4 force and violence; all in violation of Title 18, United States Code, Section 1951; and Title 18,
5 United States Code, Section 2.

6 **Count Four**

(Brandishing a Firearm in Furtherance of a Crime of Violence)

7 On or about May 8, 2014, in the State and Federal District of Nevada,
8

9 **BRIAN WRIGHT, and**
DANIELLE PERREIRA,

10 defendants herein, during and in relation to the crime of violence charged in Count Three of this
11 indictment, knowingly and intentionally used and carried a firearm to wit: a black handgun of
12 unknown make and model; and a Glock, Model 22, .40 Caliber semiautomatic hand gun, bearing
13 serial number GPR334, and said firearm was brandished; all in violation of Title 18, United
14 States Code, Section 924(c)(1)(A)(ii) and (iii) and Title 18, United States Code, Section 2.

15 **Count Five**

(Felon In Possession of a Firearm)

16 On or about June 6, 2014, in the State and Federal District of Nevada,
17

18 **BRIAN WRIGHT**

19 defendant herein, having been convicted of crimes punishable by imprisonment for a term
20 exceeding one year, in the State of Nevada, to wit: Conspiracy to Commit Robbery, Burglary
21 while in Possession of a Firearm and Robbery with the Use of a Deadly Weapon, on or about
22 March 22, 2007, in Case No. C228928, in the Eighth Judicial District Court, Clark County, did
23 knowingly possess a firearm, to wit: a Glock Model 27 .40 caliber handgun bearing serial
24 number "VNG189," said possession being in and affecting interstate commerce and said firearm

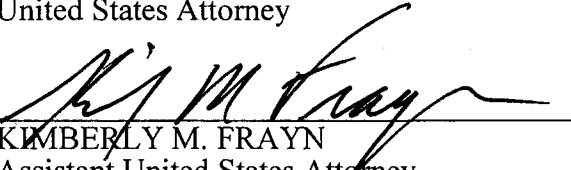
1 having been shipped and transported in interstate and foreign commerce, all in violation of Title
2 18, United States Code, Section 922(g)(1) and 924(a)(2).

3
4 **DATED:** this 13th day of January, 2015.

5 **A TRUE BILL:**

6 /S/
FOREPERSON OF THE GRAND JURY

7
8 DANIEL G. BOGDEN
United States Attorney

9 
10 **KIMBERLY M. FRAYN**
Assistant United States Attorney